

**IN THE UNITED STATES DISTRICT COURT FOR
WESTERN DISTRICT OF PENNSYLVANIA**

ABBY B. CONLEY,

CIVIL DIVISION

Plaintiff,

No.: 05-CV-76 E

-vs-

Judge Sean J. McLaughlin

COUNTY OF ERIE, ERIE COUNTY OFFICE
OF CHILDREN AND YOUTH a/k/a ERIE
COUNTY CHILD WELFARE SERVICE,
RICHARD SCHENKER, individually and in
his capacity as County Executive of Erie
County, Pennsylvania, PETER CALLAN,
individually and in his capacity as Erie County
Director of Personnel, DEBRA LIEBEL,
individually and in her capacity as Executive
Director, Erie County Office of Children and
Youth a/k/a Erie County Child Welfare
Service, and JOHN A. ONORATO,
ESQUIRE, individually and in his capacity as
Erie County Solicitor,

Defendants.

**MOTION TO EXTEND TIME FOR RESPONDING TO
REQUEST FOR PRODUCTION OF DOCUMENTS**

AND NOW, comes the Defendants, by and through their attorney, Edmond R. Joyal, Jr., Esquire and Law Office of Joseph S. Weimer and move this Honorable Court for an Order allowing them additional time to supplement their responses to Plaintiff's Request for Production of Documents:

1. On January 4, 2006, this Honorable Court entered an Order in which Defendants were given twenty (20) days to respond to Plaintiff's Interrogatories and Request for Production of Documents.

2. The administration of Erie County and the Erie County Office of Children and Youth was changed and the new administration took office on January 2, 2006.

3. The new administration included a new county executive, director of the Office of Children and Youth and solicitor for the Office of Children and Youth.

4. Counsel for these Defendants has sent a copy of the transcript of the hearing to the solicitor for the Office of Children and Youth for review. Counsel waited for this transcript to be transcribed in order to be certain as to the contents of the Court's oral Order in this matter.

5. The solicitor for the Office of Children and Youth has made counsel for the Defendants aware of the need to request an extension of time to respond to many of the Requests made by Plaintiff and granted by the Court because of the sheer volume of the records requested and the time necessary to review those records, including case and court files, and to make the necessary redactions to protect individual privacy.

6. A copy of an Affidavit executed by Ines Massela, the newly appointed solicitor for the Erie County Office of Children and Youth is attached hereto as "Exhibit A".

7. Defendants respectfully request that the Court grant them an extension of twenty (20) days to respond to the Plaintiff's Requests or in the alternative to limit the scope of these Requests.

WHEREFORE, Defendants move this Honorable Court to grant their Motion and to Extend the time for Compliance for an additional twenty (20) days.

LAW OFFICE OF JOSEPH S. WEIMER

BY: s/Edmond R. Joyal, Jr.
Edmond R. Joyal, Jr., Esquire
PA I.D. #65907
Attorney for Defendants
Law Office of Joseph S. Weimer
975 Two Chatham Center
Pittsburgh, PA 15219
(412) 338-3184

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing MOTION TO
EXTEND TIME FOR RESPONDING TO REQUEST FOR PRODUCTION OF DOCUMENTS
has been served by First Class Mail, postage pre-paid, upon the following parties on this 24th day
of January, 2006.

Anthony Angelone, Esquire
Vendetti & Vendetti
3820 Liberty Street
Erie, PA 16509
(*Counsel for Plaintiff*)

Timothy D. McNair, Esquire
Law Office of Timothy D. McNair
821 State Street
Erie, PA 16501
(*Counsel for Plaintiff*)

Mark Lane, Esquire
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525 William Penn Place, Suite 3700
Pittsburgh, PA 15219-1707
(*Counsel for Defendant, John A. Onorato, Esquire*)

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